

**FILED**

**UNITED STATES DISTRICT COURT**  
 NORTHERN DISTRICT OF ILLINOIS  
 WESTERN DIVISION

AUG 16 2008

MAGISTRATE JUDGE P. MICHAEL MAHONEY  
 United States District Court

UNITED STATES OF AMERICA

v.

RAMON MITCHELL and  
 ERIC CARTER

**CRIMINAL COMPLAINT**

CASE NUMBER: *08 CR 50039*

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about August 14, 2008, at in the Northern District of Illinois, Western Division, defendants herein:

by intimidation, did take from the person and presence of employees of the Blackhawk State Bank, 5206 Elevator Road, Roscoe, Illinois, approximately \$122,992 in money belonging to and in the care, custody, control, management, and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

in violation of Title 18, United States Code, Section 2113 (a). I further state that I am a FBI Special Agent and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT.**

Continued on the attached sheet and made a part hereof:   x   Yes        No

*Casimir J. Solana*  
 Signature of Complainant  
 Casimir Solana, Special Agent, FBI

Sworn to before me and subscribed in my presence,

August 16, 2008  
 Date

at Rockford, Illinois  
 City and State

P. Michael Mahoney, U.S. Magistrate Judge  
 Name & Title of Judicial Officer

*P. Michael Mahoney*  
 Signature of Judicial Officer

NORTHERN DISTRICT OF ILLINOIS     )  
  ) ss.  
WESTERN DIVISION                         )

**AFFIDAVIT**

I, Casimer Solana, being duly sworn on oath, hereby state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for over nine years. As a Special Agent with the FBI, my current duties include the investigation of robberies and attempted robberies of federally insured financial institutions in violation of 18 U.S.C. § 2113.
2. During the performance of my duties as a Special Agent with the FBI, I have participated with other law enforcement agents and officers in the investigation of an armed robbery of the Blackhawk State Bank, 5206 Elevator Road, Roscoe, Illinois (hereinafter referred to as "Blackhawk State Bank") which occurred August 14, 2008 at approximately 3:00 p.m.
3. This affidavit is submitted in support of the attached complaint. Other federal and local law enforcement officers have participated in this investigation and I have discussed the results of their investigation into this matter with them. This affidavit is based in part upon those discussions as well as my own investigation and observations. This affidavit does not contain all of the information concerning the investigation that is known to me, but sets forth only those relevant facts necessary to establish probable cause that the defendants committed the offense charged in the complaint. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only.
4. On August 14, 2008, I responded to the Blackhawk State Bank after employees had reported that a robbery had occurred. I spoke with an individual employed as a teller at Blackhawk State

Bank (hereinafter "Teller A"). Teller A said that at approximately 3:00 p.m. on August 14, 2008, a black male entered the Blackhawk State Bank and approached her teller window. The black male gave Teller A a multi-colored red and white backpack and piece of paper. Teller A said that the piece of paper said give me all of your money and all of the money in the drive through. After reading the note, Teller A said that she put the money from her teller drawer into the backpack except for the "bait" money in her teller drawer. Blackhawk State Bank places "bait" money, which are bills for which the serial numbers have previously been recorded, in each teller's drawer. As Teller A was putting the money into the backpack, Teller A said she saw a pair of purple and yellow shoes in the backpack. Teller A initially attempted to give the bag back to the black male but the black male told Teller A to give him all of the money. Teller A then walked with the backpack to the drive through counter. Teller A said that when she went back to drive through counter she told another teller (hereinafter "Teller B") to pull Teller B's bait bills from her drawer because Teller A forgot to do so. Teller A said that Teller B told her that they would pull Teller B's bait bills after the black male left. Teller A said that Teller A and B then walked to a counter near the teller counter for the drive through. That counter had approximately \$95,000 in United States Currency on it that bank employees were in the process of counting and preparing to place in the bank's ATM machine. Teller A and B then placed all of the approximately \$95,000 in United States Currency into the backpack. After placing the money in the backpack, Teller A took the backpack back to Teller A's counter and gave the backpack and the piece of paper back to the black male. The black male then left the bank. Teller A described the black male as <sup>o/p 8-16-08</sup> ~~wearing~~ being in his early twenties, thin, 150 pounds, light skinned with freckles on his face and "jagged" teeth. Teller A said the black male was wearing plastic dark sunglasses with large, "goggle-like" lenses.

5. The branch manager of Blackhawk State Bank, Becky Brown, told me that the deposits of the Blackhawk State Bank were insured by the FDIC on August 14, 2008.

6. On August 15, 2008, an individual (hereinafter referred to as "CI") contacted the Beloit, Wisconsin Police Department regarding having information about a bank robbery in Roscoe, Illinois. The Beloit Police Department referred the CI to the Roscoe, Illinois Police Department. At approximately 3:30 p.m. on August 15, 2008, the CI met with Detective Sam Hawley of the Roscoe Police Department. The CI told Detective Hawley that earlier in the day on August 15, 2008, the CI was in a car with a male who had \$200 cash. The CI asked the male where he obtained the \$200. The male initially refused to tell the CI where he obtained the money, but eventually told the CI that another male named "Grizzle," gave him the money. The male told the CI that Grizzle got \$100,000 from a bank robbery in Roscoe. Grizzle further told the male that three or four people took part in the robbery and that each person received approximately \$20,000. The male gave the CI \$20 and said it was part of the money given to the male by Grizzle. The CI provided Detective Hawley with that \$20 bill.

7. The CI further told Detective Hawley that after meeting with the male and obtaining the \$20, he went to Grizzle's residence at 1305 Harvey Street, Beloit, Wisconsin (hereinafter referred to as "1305 Harvey Street"). The CI met with Grizzle and asked him for some money. The CI saw a red 1979 or 1980 Chevy Caprice with spoked wheel rims parked at 1305 Harvey. The CI asked Grizzle about the car. Grizzle told the CI that he bought a car from a male named "Little Man" earlier on August 15, 2008 who lives on Copeland Street, Beloit. After leaving Grizzle's house, the CI went and met with Detective Hawley at approximately 3:30 p.m. on August 15, 2008. During the meeting the CI, the CI described Grizzle as a black male, 5'11", 160 pounds, light complexion and "messed-

up" front teeth. Detective Hawley showed the CI a still photograph taken from the Blackhawk State Bank surveillance video at the time of the bank robbery. The CI identified the black male who was at Teller A's counter as the individual the CI knows as Grizzle.

8. After meeting with Detective Hawley, the CI returned to 1305 Harvey Street and obtained the license plate number for the Chevy Caprice. The CI called Detective Hawley and told him that the license plate for the Chevy Caprice was a State of Wisconsin plate and the number was 879NYJ. Detective Hawley checked motor vehicle registration records for the State of Wisconsin and determined that the Chevy Caprice is registered to Inman Jones who resides on Copeland Street in Beloit, Wisconsin.

9. Later on August 15, 2008, the CI called Detective Hawley said that he was at Grizzle's house and Grizzle told the CI that an individual named "Eric," who drives a maroon Monte Carlo, was involved in the bank robbery at the bank in Roscoe and that Eric received \$34,000 from the bank robbery proceeds. The CI provided Detective Hawley with the license plate for the Monte Carlo and Detective Hawley determined from Wisconsin motor vehicle records that it was registered to Heather Keker who resides in Plymouth, Wisconsin.

10. The CI called Detective Hawley again at approximately 5:55 p.m. and told Detective Hawley that he was in the residence at 1305 Harvey Street but that Grizzle had left to go purchase cocaine from the same individual from whom Grizzle had purchased the Chevy Caprice.

11. Based upon my training and experience and my discussions with other people knowledgeable about methods, schemes and operations used by individuals who commit bank robberies, I know that such individuals:

a. Commonly use cellular telephones to communicate with each during the planning and execution of bank robberies;

b. Commonly conceal the robbery proceeds and other items used in the commission of the robbery, such as items used to conceal their identity, at their residences;

12. On August 15, 2008, a federal Magistrate Judge in the Western District of Wisconsin issued a search warrant for 1305 Harvey Street. On August 16, 2008, at approximately 7:00 a.m., federal and local law enforcement agents executed the search warrant at 1305 Harvey. Agents located and seized \$1,000 in twenty dollar bills from the residence. At the time the search warrant was executed agents located Ramon Mitchell in an upstairs bedroom inside the residence. Agents searched the bedroom where Ramon Mitchell was located and found a picture ID with the name Ramon Mitchell and birth certificate in the name of Ramon Mitchell. The picture on the ID matched the individual located in the bedroom. Agents also located Lyndzie Clark and a six year old child in the same room with Ramon Mitchell. Agents also located Jessica Clark and Carlos Royster in the residence as well. During the execution of the search warrant, agents located Eric Carter sleeping in a red Monte Carlo outside the residence at 1305 Harvey Street.

13. Detective Hawley and I interviewed Lyndzie Clark and she told us that she knew the individual who was in the bedroom with her with the search warrant was executed as "Grizzle." Lyndzie Clark said that Grizzle was her boyfriend. We showed her surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and she identified the individual in the photographs who had committed the robbery as Grizzle (Ramon Mitchell). Lyndzie Clark denied any knowledge of the bank robbery.

14. Detective Hawley and I also interviewed Jessica Clark. Jessica Clark said that she is Lyndzie Clark is her sister and that "Grizzle" is her sister's boyfriend. The agents showed her surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and she identified the individual in the photographs who had committed the robbery as Grizzle (Ramon Mitchell).

15. FBI Special Agent Michael Dalide interviewed Carlos Royster. Royster stated that he knew the other adult male who was in the house at the time the search warrant was executed as "Grizzle" and also as Cody Banks. On August 14, 2008, Royster talked to Cody and Cody told Royster that he and some other individuals did a stick up in Roscoe, Illinois. Special Agent Dalide showed Royster surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and he identified the individual in the photographs who had committed the robbery as Cody Banks (Ramon Mitchell).

16. Detective Hawley and I interviewed Eric Carter. Carter told us that he was involved in the planning of the robbery of the Blackhawk State Bank prior to August 14, 2008. Carter also provided a signed written statement. In his statement Carter said that on August 13, 2008 he was at 1305 Harvey Street and met with an individual he knows as "Grizzle" and another male (hereinafter referred to as "Individual A"). Carter said that Individual A told him that he had "lick," which is another name for a robbery, at a bank. Carter stated that Clark, Individual A and Grizzle all got into Individual A's car, a black, two door car, and drove from Beloit south on Route 51 to bank in Illinois in a town which starts with an "R." Individual A drove to the parking lot of a bank and Carter, Individual A and Grizzle all discussed where to park the vehicle during the robbery of the bank. On the way back to Beloit, Carter, Individual A and Grizzle discussed leaving the state of Wisconsin after the robbery and Grizzle suggested that Carter and Grizzle go to Atlanta for a few weeks after committing the robbery. Carter stated that on August 14, 2008, between 2 and 3 p.m. on August 14,

2008 he, Individual A and Grizzle drove in Individual A's black, two door car to the same bank that they had driven to on August 13, 2008. Individual A parked in the bank parking lot and left the engine running. Grizzle got out the car and walked into the bank. When Grizzle left the car, he had a set of sunglasses with him and a red and white book bag. Approximately 5 minutes later, Grizzle returned to the car and Individual A put the car in drive and drove out of the parking lot. Individual A drove them to a house in Beloit where Carter, Individual A and Grizzle went inside. When they were inside the house, Grizzle dumped out the money from the backpack. Carter believed that there was approximately \$50,000 in cash. Carter stated that Individual A told Carter that he should get \$10,000 and that Individual A and Grizzle should split the rest. Individual A handed Carter \$10,000 in cash and told him to take. Carter took the money. Carter said that he and Grizzle left the residence and walked to 1305 Harvey Street. Carter said that when he arrived at the residence, he counted the money and that it was \$10,000. Carter said that took out a couple hundred dollars for himself and that he gave the rest of \$10,000 to Grizzle to hold for Carter.

17. FBI Special Agent Randall Sealby and Detective Hawley interviewed Ramon Mitchell. During that interview, Mitchell agreed to provide a written statement. In his written statement, Mitchell admitted to going to the Blackhawk State Bank on August 14, 2008 in a blue Nissan with Eric Clark and another individual (hereinafter referred to as "Individual B"). Mitchell also admitted entering the bank and giving the teller a red and white backpack but denied presenting a note to the teller demanding money. Mitchell stated that the teller filled the backpack up with money without him asking her to do so. Mitchell said that after he left the bank he got back into the car with Clark and Individual B and he was given a ride back to Beloit. Mitchell stated that he left the backpack in the vehicle when he got out and that he did not get any proceeds from the robbery.

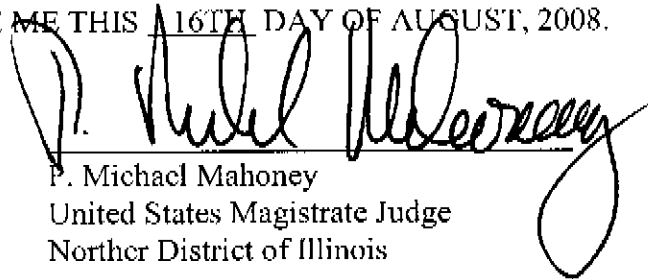


18. The information contained within this affidavit is true and correct to the best of my knowledge and belief.



CASIMER SOLANA  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 16TH DAY OF AUGUST, 2008.



P. Michael Mahoney  
United States Magistrate Judge  
Northern District of Illinois